

### STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0049794; AI 19474; PER20080001** to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality  
Office of Environmental Services  
P. O. Box 4313  
Baton Rouge, Louisiana 70821-4313

- I.     **THE APPLICANT IS:**           Louisiana Water Service, Inc  
  Kingspoint Wastewater Treatment Plant  
  201 Holiday Blvd. Suite 150  
  Covington, LA 70433
- II.    **PREPARED BY:**               Rachel Davis
- DATE PREPARED:**           October 24, 2008
- III.   **PERMIT ACTION:**           reissue LPDES permit LA0049794; AI 19474; PER20080001

LPDES application received: August 22, 2008

EPA has not retained enforcement authority.

LPDES permit issued: March 1, 2004

LPDES permit expires: February 28, 2009

IV.    **FACILITY INFORMATION:**

- A.     The application is for the discharge of treated sanitary wastewater from a privately owned treatment works serving the Kingspoint Subdivision.
- B.     The permit application does not indicate the receipt of industrial wastewater.
- C.     The facility is located at 650 Voters Road in Slidell, St. Tammany Parish.
- D.     The treatment facility consists of an extended aeration sewage treatment plant with chlorine disinfection.
- E.     Outfall 001

Discharge Location:   Latitude 30° 15' 22" North  
  Longitude 89° 45' 2" West

Description:           treated sanitary wastewater

Expected Flow:        2,017 Homes x 400 GPD = 806,800 GPD  
  100 One-Bedroom Apartments x 250 GPD = 2,500 GPD  
  55 Two-Bedroom Apartments x 300 GPD = 16,500 GPD  
  **825,800 GPD = 0.8258 MGD**

The facility has increased it's flow from 0.7714 MGD to 0.8258 MGD due to the addition of 150 homes and 55 Two-Bedroom Apartments.

Calculations for gallons per day were based upon figures obtained from Chapter 15 of the State of Louisiana Sanitary Code, Department of Health and Hospitals, Office of Public Health.

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Type of Flow Measurement which the facility is currently using:  
V-Notch Weir/Totalizing Meter/Continuous Recorder

**V. RECEIVING WATERS:**

The discharge is into the St. Tammany Parish W-14 Canal, thence into Salt Bayou in segment 040909 of the Lake Pontchartrain Basin. This segment is listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 040909 of the Lake Pontchartrain Basin are as indicated in the table below<sup>1/</sup>:

Degree of Support of Each Use						
Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Not Supported	Not Supported	Full	N/A	N/A	N/A	N/A

<sup>1/</sup>The designated uses and degree of support for Segment 040909 of the Lake Pontchartrain Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2006 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

**VI. ENDANGERED SPECIES:**

The receiving waterbody, Subsegment 040909 of the Lake Pontchartrain, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 27, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

**VII. HISTORIC SITES:**

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

**VIII. PUBLIC NOTICE:**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

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Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Ms. Rachel Davis  
 Water Permits Division  
 Department of Environmental Quality  
 Office of Environmental Services  
 P. O. Box 4313  
 Baton Rouge, Louisiana 70821-4313

**IX. PROPOSED PERMIT LIMITS:****Final Effluent Limits:**

Subsegment 040909, W-14 Main Diversion Canal- From its origin in the north end of the City of Slidell to its junction with Salt Bayou, is listed on LDEQ's Final 2006 303(d) List as impaired for pathogen indicators. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL.

**Pathogen Indicators**

To protect the receiving waterbody against high levels of pathogenic organisms, fecal coliform limitations have been established in the general permit

**OUTFALL 001**

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
CBOD <sub>5</sub> April- October	68	10 mg/l	15 mg/l	Limits are set based on the Wasteload Allocation for the City of Slidell, W-14 Canal and the previous permit
BOD <sub>5</sub> November-March	137	20 mg/l	30 mg/l	Limits are set based on the Wasteload Allocation for the City of Slidell, W-14 Canal and the previous permit
TSS April- October November- March	103 137	15 mg/l 20 mg/l	23 mg/l 30 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with

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Effluent Characteristic	Monthly Avg (lbs./day)	Monthly Avg	Weekly Avg	Basis
				the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.
Ammonia-Nitrogen April-October November-March	34 N/A	5 mg/l Report	10 mg/l Report	Limits are set based on the Wasteload Allocation for the City of Slidell, W-14 Canal and the previous permit
Dissolved Oxygen** April-October November-March		5.0 mg/l 5.0 mg/l	N/A N/A	Limits are set based on the Wasteload Allocation for the City of Slidell, W-14 Canal and the previous permit

\*Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which express BOD<sub>5</sub> and TSS in terms of concentration.

\*\*This Dissolved Oxygen limit is the lowest allowable average of daily discharges over a calendar month. When monitoring is conducted, the Dissolved Oxygen shall be analyzed immediately, as per 40 CFR 136.3.

**Other Effluent Limitations:****1) Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Daily Maximum) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

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## 2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

## 3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0049794: Issued: March 1, 2004  
Expired: February 28, 2009

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Daily Avg.</u>	<u>Weekly Avg</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	Continuous	Recorder
CBOD <sub>5</sub>				
April- October	10 mg/l	15 mg/l	1/week	3 Hour Composite
BOD <sub>5</sub>				
November-March	20 mg/l	30 mg/l	1/week	3 Hour Composite
TSS				
April-October	15 mg/l	23 mg/l	1/week	3 Hour Composite
November-March	20 mg/l	30 mg/l	1/week	3 Hour Composite
Ammonia-Nitrogen				
April-October	5 mg/l	10 mg/l	1/week	3 Hour Composite
November-March	Report	Report	1/week	3 Hour Composite
Dissolved Oxygen				
April-October	5.0 mg/l	N/A	1/week	3 Hour Composite
November-March	5.0 mg/l	N/A	1/week	3 Hour Composite
Fecal Coliform Colonies	200	400	1/week	Grab

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

## A) Inspections

A review of the files indicates the following inspections were performed during the period beginning June 2006 and ending June 2008 for this facility.

Date: September 25, 2007

Inspector: Heather Sawyer

Findings and/or Violations:

1. The facility has a current LPDES permit
2. All DMRs have been submitted and no violations were noted for the facility.

## B) Compliance and/or Administrative Orders

A review of the files indicates that no compliance orders have been issued against the facility in the last two years.

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**C) DMR Review**

A review of the discharge monitoring reports for the period beginning **June 2006** through **June 2008** has revealed no violations for the facility.

**XII. ADDITIONAL INFORMATION:**

The Louisiana Department of Environmental Quality (LDEQ) reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDLs. The LDEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions. In accordance with LAC 33:IX.2903., this permit may be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitations issued or approved under sections 301(b) (2) Cc) and CD); 304(b) (2); and 307(a) (2) of the Clean Water Act, if the effluent standard or limitations so issued or approved:

1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
2. Controls any pollutant not limited in the permit; or
3. Require reassessment due to change in 303(d) status of waterbody; or
4. Incorporates the results of any total maximum daily load allocation, which may be approved for the receiving water body.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.8258 MGD.

Effluent loadings are calculated using the following example:

$$\text{BOD: } 8.34 \text{ lb/gal} \times 0.8258 \text{ MGD} \times 10 \text{ mg/l} = 68 \text{ lb/day}$$

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are standard for facilities of flows between **0.50** and **1.0** MGD.

Effluent CharacteristicsMonitoring Requirements

	<u>Measurement</u>	<u>Sample</u>
	<u>Frequency</u>	<u>Type</u>
Flow	Continuous	Recorder
CBOD <sub>5</sub>	1/week	3 Hour Composite
BOD <sub>5</sub>	1/week	3 Hour Composite
Total Suspended Solids	1/week	3 Hour Composite
Ammonia-Nitrogen	1/week	3 Hour Composite
Dissolved Oxygen	1/week	3 Hour Composite
Fecal Coliform Bacteria	1/week	Grab
pH	1/week	Grab

**XIII. TENTATIVE DETERMINATION:**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

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**XIV. REFERENCES:**

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Louisian Water Service, Inc, Kingspoint Wastewater Treatment Plant, August 22, 2008.

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